

San Diego Offsets



State Offsets

☐ AB3319

- No NO_x or VOC Required
- Annual No Net Increase

☐ None – Other Criteria

- CO and SO_x
- PM₁₀ (mitigate AQIA only)



Federal Major Source

☐ **NO_x** or VOC > 50 tpy

- Lowest Achievable Emission Rate
- Air Quality Impact Analysis
- **Emission Offsets at 1.2 to 1**



Proposed PG&E Power Plant

- ❑ Two natural gas turbines
- ❑ 510 megawatts of electricity
 - Power for 500,000 homes
- ❑ 100 tpy of NOx
- ❑ Offsets - 120 tpy



Current ERCs “Available”

☐ NOx

- 122 tons NOx and 224 tons VOC
- 234 tons NOx equivalent total
- 50 tons optioned to PG & E Gen

☐ EPA RACT Adjustment



Turbine Emission Levels

- ❑ 225 ppm — 1970 Uncontrolled
- ❑ 42 ppm — 1973 Rule 68
- ❑ 9 – 15 ppm — 1997 BARCT



Potential NO_x ERC Sources

- ☐ Overcontrol Existing Sources
- ☐ Existing Power Plants
- ☐ Exempt Equipment
 - Turbines < 1 MW pre 1994
 - Boilers < 5 MMBtu/hr
- ☐ MERCs



Scarcity of NOx Offsets

Rising Costs

- 1994 – \$14,000/ton
- 1999 – \$45,000/ton
- 2000 – **\$70,000/ton**

